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July 18, 2011

VIA FACSIMILE

Hon. Paul G. Gardephe
United States District Judge
United States Courthouse
500 Pearl Street
Room 920
New York, NY 10007-1312
Facsimile: (212) 805-7986

Re: *Guggenheim Capital, et al. v. Toumei, et al.*
C.A. No. 10 Civ 8830 (PGG)

Dear Judge Gardephe:

We represent Plaintiffs in the above matter. We are writing concerning the Court's Orders of July 17, 2011, which granted statutory damages, attorneys' fees and costs against Defendants Catarina Toumei, Vladimir Zuravel and Eli Pichel (Dkt. No. 102) and granted default judgment against Defendants David Birnbaum and Dabir International, Ltd. (Dkt. No. 103). Pursuant to the first Order, Plaintiffs must submit a declaration and documentation concerning their requested attorneys' fees and costs by July 20, 2011. Pursuant to the second Order, Plaintiffs must submit a declaration and documentation concerning their requested attorney's fees and costs by July 22, 2011.

Due to the press of other cases that Plaintiffs' counsel is handling, Plaintiffs respectfully request an extension of those deadlines until August 5, 2011. Plaintiffs' counsel must file a Rule 60 brief this Wednesday in another matter, which will involve expert testimony. Plaintiff's counsel may have a oral argument in the First Circuit in connection with that matter on Monday, July 25. Plaintiff was retained in the First Circuit matter late last week and is literally just beginning to prepare for the argument. Due to Plaintiffs' counsel's obligations in these matters, Plaintiffs respectfully request an extension until August 5, 2011 to comply with the July 17, 2011 Orders

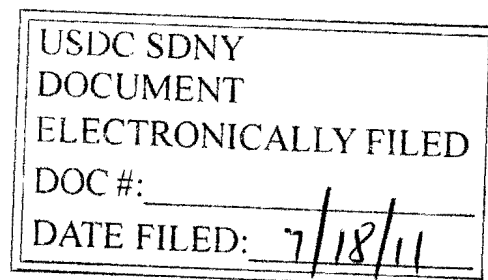
MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S. J.

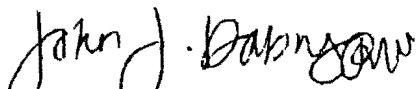
Dated: *July 18, 2011*



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(Docket Nos. 102 and 103). Plaintiffs respectfully submit that the requested continuance would not appear to prejudice Defendants.

Respectfully submitted,



John J. Dabney

cc: David Birnbaum (via U.S. mail)
Dahir International, Ltd. (via U.S. mail)
Catarina Pietra Toumei (via email)
Vladimir Zuravcl (via email)
Eli Pichel (via email)